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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ASHLEY SCHROEDER, et al.,

Plaintiffs,

v.

UNIVERSITY OF OREGON,

Defendant.

Case No. 6:23-cv-01806-MC

**DECLARATION OF DOUGLAS
PARK IN SUPPORT OF
DEFENDANT'S MOTION FOR
PROTECTIVE ORDER**

I, Douglas Park, declare as follows:

1. I am employed at the University of Oregon (the "University") in the University's Office of General Counsel, and I currently hold the title of Deputy General Counsel. I am over the age of 18 years old and competent to testify as to the matters set forth herein.

2. Recently, three University employees critical for supporting this litigation, and other pending legal matters in the Office of General Counsel, have left the University entirely or have accepted promotions to different offices. First, one of our attorneys in the General Counsel's office who had been involved with this case recently left the University for a different professional opportunity at a private law firm.

1- DECLARATION OF DOUGLAS PARK IN
SUPPORT OF DEFENDANT'S MOTION FOR
PROTECTIVE ORDER

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3. Second, our one paralegal in the Office, who would have been instrumental in identifying and collecting documents responsive to Plaintiffs' voluminous discovery requests, left the General Counsel's office for an opportunity in a different office at the University.

4. Third, the University's Deputy Athletic Director who is primarily responsible for the Athletics financial and budget operations accepted a new position as Athletic Director for a different university. This employee would have been integral to identifying and collecting documents responsive to Plaintiffs' discovery requests.

5. The employee hiring process at the University, a public institution, is a lengthy one. All hiring decisions occur on a longer timeline and are not completed as expeditiously as in the private sector. *See, e.g.*, Human Resources, Recruitment and Hiring, <https://hr.uoregon.edu/recruitment-and-hiring>.

6. I anticipate that it will take several months to fill and onboard the two open positions in the University's General Counsel's office, and that delay hinders the University's ability to dedicate resources to the voluminous discovery requests propounded by Plaintiffs in this case. Although the Deputy Athletic Director position has been filled, it is unclear when the person will start.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED at Eugene, Oregon, this 14th day of January, 2025.

By: /s/ Douglas Park
Douglas Park